



Department of Energy

Idaho Operations Office

1955 Fremont Avenue

Idaho Falls, ID 83415

August 3, 2011

Mr. Edward Kowalski, Director
EPA Region 10
1200 6th Ave., MS OCE-164
Seattle, WA 98101

SUBJECT: Request for Modification of the Toxic Substance Control Act (TSCA) Risk-Based Disposal Approval (RBDA) Application for Management of Transuranic Polychlorinated Biphenyl (PCB) Remediation Waste at the Advanced Mixed Waste Treatment Project (AMWTP) Facility (OS-ETSD-11-098)

Dear Mr. Kowalski:

The Department of Energy, Idaho Operations Office (DOE-ID) is requesting to modify the existing "Risk-Based Disposal Approval (RBDA) Application for Management of Transuranic Polychlorinated Biphenyl (PCB) Remediation Waste at the Advanced Mixed Waste Treatment Project (AMWTP) Facility," dated June 12, 2007. This modification request is under the authority of 40 CFR 761.61(c) PCB Remediation Waste RBDA. DOE-ID requests that the original RBDA include the addition of treatment (through absorption) of free liquids within the AMWTP WMF-676 Box Lines (North Box Line and South Box Line) of waste contaminated with PCB liquids as outlined in "Risk-Based Disposal Approval Request for PCBs Contaminated with Radioisotopes at the AMWTP Facility," dated June 2, 2011. The waste is remediation waste, identified as IDC RF003, IDC BC203, and IDC RF480, currently stored at the AMWTP and destined for disposal to the Waste Isolation Pilot Plant (WIPP).

In addition, this modification request includes the disposition and handling of drums and liners that contain PCB sludge waste to be treated in the AMWTP WMF-676 Box Lines. DOE-ID requests these drums and/or liners that are determined not to be contaminated with PCBs be treated by volume reduction in the AMWTP Supercompactor and managed as mixed waste. DOE-ID is also requesting that drums and/or liners that come into incidental contact with PCB waste be managed on a self-implementing basis according to the requirements of 40 CFR 761 and as outlined in the AMWTP "Risk-Based Disposal Approval (RBDA) Position Paper 'Incidental Waste Contact.'"

Mr. Kowalski

-2-

August 3, 2011

If you have any questions or concerns regarding the application, please contact me at 208 526-0082.

Sincerely,

A handwritten signature in black ink, appearing to read "D. L. Wessman". The signature is fluid and cursive, with the first name "D." and last name "Wessman" clearly distinguishable.

David L. Wessman
TSCA Compliance Manager

cc: D. Bartus, EPA Region 10
R. Bullock, DEQ, Boise ID
G. Robinson, BBWI